

**MEMO ENDORSED**

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September 15, 2023

**VIA ECF ELECTRONIC FILING**

Hon. Valerie E. Caproni, U.S.D.J.  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 443  
New York, New York 10007

**Re: Manny Pastreich, as Trustee, et al. v. Sovereign Security LLC**  
**Civil Action No. 23-cv-6469**

Dear Judge Caproni:

Our firm represents the Plaintiffs in this matter (collectively the “Funds”). Please accept this joint request from all parties to adjourn the Initial Conference scheduled before Your Honor for September 22, 2023, and the associated deadline to submit a Joint Letter and proposed Case Management Plan. These dates have not been previously rescheduled, and no prior requests to adjourn have been made.

Presently, Defendant Sovereign Security LLC’s (“Sovereign”) deadline to answer or otherwise respond to the Complaint in this matter is November 1, 2023. See ECF Document 8. Further, counsel for Sovereign underwent eye surgery a couple of days ago, and remains presently under a physician’s care and unable to participate in the Conference on the 22<sup>nd</sup> or the preparation of the Case Management Plan and Joint Letter. Consequently, the parties jointly ask that both dates be adjourned to after November 1, 2023.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,



Samuel R. Bloom

cc: Richard Romeo, Esq. (via electronic mail)

Application GRANTED. The initial pretrial conference scheduled for September 22, 2023, is hereby ADJOURNED to **Friday, November 17, 2023 at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint submission in advance of the conference is due no later than **November 9, 2023**. For submission requirements, please see docket entry 5.

SO ORDERED.



Date: 9/18/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE